



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

April 11, 1983

PERSONNEL MANAGEMENT LETTER NO. 83-5 (511)

Subject: Report of Intra-Agency Classification Consistency

Departmental policy regarding appropriate application of the intra-agency classification consistency report requirement is contained in PML No. 81-50 (511), November 17, 1981. Although FPM Chapter 210,1-1 defines "agency" as a department-level organization, the term has been used differently for different purposes, both formally and informally, by OPM (i.e., single-agency standard; the GS-1102 Contract and Procurement Series occupational standards; OPM practice regarding consistency reports and various OPM advisories). Governmentwide, the term "agency" is used in reference to both department and bureau level organizational units.

We recently requested a specific response and clarification on this issue from Gust Pappas, Chief, Classification Appeal Office, OPM. His March 1, 1983 response (attached) leaves no question as to his official interpretation. No further question should remain regarding the appropriate application of the consistency report requirement. When an OPM certification of a position results in a change in the allocation of that position, the consistency report must include a review of all identical, similar or related positions throughout the Department.

Director of Personnel

Attachment

INQUIRIES: Bernice T. Struhs, Chief, Division of Position Classification
and Management. Room 5021. Phone 343-4231



United States
**Office of
Personnel Management**

Washington, D.C. 20415

MCC:APP

Ms. Bernice T. Struhs
Chief, Division of Position
Classification and Management
Office of Personnel
U. S. Department of the Interior
Washington, D. C. 20240

Dear Ms. Struhs:

This replies to your letter of February 15, 1983, which asks for clarification of the term "agency" as it is used in FPM Chapter 511, Appendix C, Report of Intra-Agency Classification Consistency. The provisions of the appendix are based on the following provision of 5 CFR Part 511.612.

"An appellate decision made by the Office is final. . . . Agencies shall review their own classification decisions for identical, similar or related positions to insure consistency with the Office's certificate [appellate decision]."


The term "agency" means the whole department (e.g., Department of the Interior) or independent agency (e.g., Environmental Protection Agency), regardless of the specific location of the position covered by the appellate decision. This definition is not necessarily the same as that applicable to any other matter (e.g., not necessarily applicable to the instructions on single-agency classification standards). Of course, a type of appealed position may be peculiar to a particular part of the agency (e.g., bureau) and, in such a case, there would not be any "identical, similar or related positions" outside that part. The agency is responsible for determining what positions, if any, are "identical, similar or related," wherever they exist.

Some additional clarification may be helpful. The conduct of an intra-agency consistency study is mandatory, not discretionary, with respect to each OPM appellate decision, whether or not the decision changes the classification of the position. However, the report to our office described in Appendix C is required only (1) when the decision changes the classification of the appealed position, whether or not the

deciding official directs the submission of a report or (2) when the decision does not change the classification but the deciding official directs that a report be submitted anyhow.

Please let me know if you want any further clarification.

Sincerely,


Gust Pappas, Chief
Classification Appeals Office